



<b>Department</b>	Corporate	<b>Date Review</b>	Feb 2024
<b>Document Name</b>	Privacy Policy	<b>Doc #</b>	CO
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## 1. Purpose of this Policy

To explain the procedures relating to privacy and the circumstances under which personal and health information is collected, stored, used, disclosed and destroyed by the Organisation. Our procedures comply with the Federal Privacy Act incorporating the Australian Privacy Principles and professional obligations. The Australian Privacy Principles set out the way organisations and government agencies can collect, use, disclose and provide access to personal and sensitive information.

## 2. Scope

This policy applies to all Belong at Home employees and volunteers.

## 3. Definitions

<b>Belong at Home/ Belong</b>	Community Home Care's trading and brand/ logo name
<b>Board Members</b>	Members of Belong at Home's Governance Body
<b>CHC</b>	Community Home Care (Inc) – Belong at Home's legal name
<b>Worker</b>	Belong at Home Employees and Volunteers

## 4. Policy Statement

Belong at Home is committed to meeting the needs and expectations of stakeholders as these related to privacy, whilst meeting related legislation and obligations.

## 5. Responsibilities

- 5.1. CEO- the CEO is responsible for ensuring this policy is adhered to across the Organisation.
- 5.2. Line Manager Responsibility- Line Managers are responsible for monitoring adherence and addressing breaches related to this policy.

## 6. Descriptions

The Organisation recognises and respects the importance of each individual's privacy. This policy and related procedures ensures all personal and health-related information held by the Organisation is handled appropriately and kept confidential.

Personal information is any information that identifies or could identify a person, whether it is true or not. It includes, for example, your name, age, gender and contact details. Personal information can also include sensitive information, which is information about your health and health services provided to you.

This Privacy Policy describes the ways and circumstances under which personal information is collected, stored, used, disclosed and destroyed by the Organisation. The Policy is intended as a guide to the Board, workers, members and for the advice of the broader community.

This policy will be published on our website for public access and reference.

### **6.1 To deliver our commitment to privacy, we shall:**

- Be obligated by and comply with the Federal Privacy Act in relation to personal information;
- Convey this Privacy Policy to all Board members and workers to ensure awareness of their requirement to uphold our privacy standards and to anyone who asks for it;
- Ensure that lawful, fair means are used to collect personal information that is necessary for our business purposes;
- Take reasonable steps to ensure that only authorised personnel who have agreed to keep personal information confidential have access to this information;
- Take reasonable steps to keep personal information up to date, accurate and complete and on request provide individuals access to their personal information; and
- Periodically review and revise this Privacy Policy and related procedures to maintain their relevance.

### **6.2 How we collect personal information**

We collect personal information orally, in writing, by telephone, via email and via our website and social media pages.

### **6.3 What we collect and why**

We collect, store and use your personal information in order to provide care and treatment to you. This includes administrative and billing purposes, quality improvement, teaching and learning activities. You are not obliged to provide us with information and you can request to remain anonymous or to use a pseudonym. However, you need to understand that anonymity can affect the level of care and treatment we provide to you, and we may have to decline your request if it is impractical for us to agree. Prior to collection of your personal information for healthcare purposes, we shall seek and obtain your consent or that of your carer/next of kin. We shall inform you of your rights and responsibilities relating to privacy. You may alter or withdraw your consent at any time. However, you must let us know if you wish to change or limit your consent.

We collect information about our members or prospective members including name, place of work, qualifications and contact details. We use this information to administer and meet member requirements for programs, services and events. We also use members' personal information for purposes of member communication and engagement in relation to the activities of the Organisation.

In connection with a job application or enquiry, we may collect information about you including your educational background, resume or CV and other information including sensitive data for example your health or ethnic origin. This information may be used for compliance with applicable laws and regulations, including workplace and equal opportunity laws. This also includes application forms, interview notes, references, names and contact details of referees and medical information provided. This information is used to inform or assist us in our decision whether or not to make you an offer of employment or engage you under a contract. If your application is unsuccessful, we'll keep your information for a period of up to 3 months, at which point we'll take reasonable steps to destroy electronic and hard copy information.

We keep information about our current employees including name, address, email, telephone numbers, Tax File Number (TFN), bank account details, next of kin contact details, date of birth, gender, salary, superannuation funds, licences, memberships, qualifications, passport details and medical health information. We use this information for human resources management, monitoring our equal opportunities policy, performance management and succession planning.

**In relation to our newsletter, distribution of information and invitations to events, we keep a database of names and contact details of stakeholders and associated organisations. This information will not be shared with a third party.**

We reserve the right to transfer your information to a third party in the event of liquidation, receivership or transfer of all or substantially all of the assets of our company provided that the third party agrees to adhere to

the terms of this Privacy Policy and provided that the third party only uses your personal data for the purposes that you provided it to us. You will be notified in the event of any transfer and have the opportunity to opt out.

#### **6.4 What information does the Organisation collect via its website?**

##### Cookies

Our website uses software known as 'cookies' to record your visit to the website and collect some statistical information. We use this information to help administer and improve our website. We do not use this information to personally identify you. Information we may collect includes:

- your server address
- your domain name
- the date and time of access to the website
- pages accessed and documents downloaded
- the previous site visited
- if you have visited the website before
- the type of browser software in use

You may set your web browser to disable cookies when visiting our websites. However, some website functions may be unavailable if you choose to do so.

##### Links to other websites

Clicking on links may result in your transfer to another website, where data practices may be different to our Organisation's Privacy Policy. It is your responsibility to ensure the security of the website you are entering.

#### **6.5 Sharing your information**

Your information will not be disclosed without your permission unless the law requires it to be given to a designated person or authority. Your consent is obtained when you first use our services and will be confirmed with you from time to time. You can change or limit your consent, but you must discuss this with us.

#### **6.6 Keeping your information safe**

We are committed to protecting your personal information. We shall only keep information we need for the purpose for which it was collected and will take reasonable steps to dispose of such information when there is no further need, or we are required by law to do so.

We shall store your information securely and protect it from unauthorised access. We shall keep a confidential record of your health issues and your treatment and care, with access limited to professionals involved in your treatment and care. We shall ensure that your personal and health information is relevant, accurate and up to date. We shall collect information directly from you, unless we are unable to do so, e.g. in an emergency. We shall make every effort to confirm with you the information collected from another source e.g. a family member, as soon as practicable.

#### **6.7 Email Security**

Any emails you send or receive from our Organisation will be automatically checked for viruses and copied for our email archives. Our IT administrators may have access to emails to manage email security. You should be aware that the internet is not a secure environment. However, we use all reasonable efforts to ensure any personal information collected, in whatever form, is held securely.

#### **6.8 Requesting access to information**

Access to information must be requested in writing by you and we shall respond within one week of receiving the request.

All requests for health information will be discussed with your CSC and the clinical team. You may be offered a copy of your record or the opportunity to review your record with Belong at Home team members. If access is denied or needs to be limited due to concerns about your health and wellbeing or that of another person, this will be discussed with you. We shall not charge you a fee to make a request for access to information, but

reasonable fees may be charged for providing the information to you e.g. for photocopying records. If you are requesting access to the information of another client, we will not grant access without that person's consent.

The Privacy Act 1988 (Privacy Act) protects an individual's [personal information](#) regardless of their age and doesn't specify an age after which an individual can make their own privacy decision. For their [consent](#) to be valid, an individual must have [capacity to consent](#). When handling the personal information of an individual with an appointed enduring power of guardian (EPG), evidence that the EPG has been enacted will be required first. If evidence is not provided and consent to provide information to the requesting party is not given by the client, details will not be shared.

### **6.9 Updating Information**

We take reasonable steps to ensure your personal information is accurate, complete and up to date whenever we collect or use it. If personal information we hold about you is inaccurate, out of date, or incomplete, please let us know and we shall make every effort to correct the information held. We shall take steps to verify your identity before providing access to personal data.

### **6.10 Disposal of Information**

Personal information (hard copy) is disposed of via on-site shredding, Docu-Shred or similar service. Access to all ICT based information is controlled under ICT policies and work instructions.

### **6.11 Making a Complaint**

Any complaints in relation to our Organisation's handling of personal information should be directed to the Chief Executive Officer. The complaint will be dealt with in accordance with our Feedback Policy. Unless a complaint can be dealt with immediately to the satisfaction of both parties, we shall provide a written response to the complaint within 30 days of receipt.

### **6.12 Changes to this Privacy Statement**

It may be necessary from time to time for the Organisation to review and revise this Privacy Policy. We shall notify changes by posting an updated version on our website [www.belongathome.org.au](http://www.belongathome.org.au)

### **6.13 Privacy during a declared Pandemic**

In order to manage the pandemic while respecting privacy, the Organisation will aim to limit the collection, use and disclosure of personal information to what is necessary to prevent and manage Covid-19, and take reasonable steps to keep personal information secure under the direction of Department of Health advice.

### **6.14 Data Breaches**

A data breach happens when personal information is accessed or disclosed without authorisation or is lost. In accordance with the Privacy Act 1988, we shall notify affected individuals in the event of a data breach and the Office of the Australian Information Commissioner (OAIC) when a data breach involving personal information is likely to result in serious harm.

## **7. Internal References**

- Client Capacity Guide
- Feedback Policy

## **8. Relevant Links:**

- The Federal Privacy Act & Privacy Amendment <https://www.legislation.gov.au/C2004A03712/latest/text>
- The Office of the Australian Information Commissioner <https://www.oaic.gov.au/>

## **9. Relevant Aged Care Standards**

- Standard 1
- Standard 7
- Standard 8